



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**SEP 27 2013**

REPLY TO THE ATTENTION OF:

Douglas Harris, General Manager  
Veolia ES Technical Solutions, L.L.C.  
7 Mobile Avenue  
Sauget, Illinois 62201

Re: Veolia ES Technical Solutions, L.L.C.'s Comprehensive Performance Test Plans for Incinerators 2, 3, and 4

Dear Mr. Harris:

Veolia ES Technical Solutions, L.L.C. (Veolia) submitted its Comprehensive Performance Test (CPT) plans and Quality Assurance Project Plan (QAPP) for Incinerators 2, 3, and 4 at its Sauget, Illinois facility to the U.S. Environmental Protection Agency on September 5, 2012. Veolia is required to conduct a CPT pursuant to the Clean Air Act (CAA) National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors, 40 C.F.R. Part 63, Subpart EEE (HWC MACT). Prior to commencing the CPT, Veolia must submit a complete CPT plan for each incinerator to EPA for review and approval or intent to deny, as required by 40 C.F.R. § 63.1207(e). The HWC MACT lists specific information that hazardous waste combustors must provide in their CPT plans. EPA discovered that Veolia's September 5, 2012 CPT plans were missing required information, so on May 13, 2013 EPA notified Veolia of its intent to deny the approval of its September 5, 2012 CPT plans and provided significant comments. In response to EPA's notice and comments, numerous emails and conversations, and an inclusion of a modified 26A testing method to establish HCl/Cl<sub>2</sub> (total chlorine) operating parameter limits, Veolia submitted revised CPT plans on September 26, 2013. EPA finds that the revised CPT plans and QAPP are complete, as required by the HWC MACT. Therefore, EPA approves Veolia's September 26, 2013 revised CPT plans and QAPP, for Incinerators 2, 3, and 4.

EPA's approval of the September 26, 2013 test plans is solely for the purpose of conducting a CPT consistent with the HWC MACT. If Veolia intends to rely on the performance test to establish a mercury system removal efficiency for Veolia's RCRA permit, Veolia should consult with the appropriate RCRA permitting authority before finalizing its CPT plans.

EPA would also like to clarify that the Agency's approval of this CPT plan or lack of comment on ancillary references in the CPT plan, such as Veolia's Feedrate Analysis Plan, description of its feed streams, or extrapolation methods, should not be deemed to be approval of such ancillary references. Furthermore, EPA would like Veolia to be aware that "demonstrate compliance," as used in the CPT plan, relates to stack emissions corresponding to feed rates used during the CPT. It does not guarantee or confirm past or future compliance with the HWC MACT. EPA believes the results of the CPT can demonstrate compliance at the time of the CPT due to the rigorous

waste feed sampling conducted prior to and during the test. However, based upon an EPA investigation of Veolia's Sauget facility, it is apparent that this type of comprehensive waste stream sampling is not done on a day-to-day basis at Veolia.

If you have any questions regarding this response, please contact Shannon Downey at (312) 353-2151 or Eleanor Kane at (312) 353-4840, of my staff.

Sincerely,

A handwritten signature in black ink that reads "Sara Breneman". The script is cursive and fluid, with the first name "Sara" and last name "Breneman" clearly legible.

Sara Breneman

Chief

Air Enforcement and Compliance Assurance Branch